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2 IN THE MATTER OF

3 UNITED STATES DISTRICT COURT  
4 NORTHERN DISTRICT OF OKLAHOMA

5 STATE OF OKLAHOMA, et al., \*  
6 Plaintiffs, \*  
7 v. \* 05-CV-0329 GKF-PJC  
8 TYSON FOODS, INC., et al., \*  
9 Defendants. \*

10

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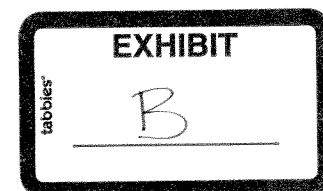
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1     ^ Start time is 9:49 a.m.

2                     (Exhibit No. 3 was marked.)

3                     THE VIDEOGRAPHER: We're on the record.

4     Today is April 7th, 2009. This is the beginning of the  
5     videotaped deposition of Steven Steele in the State of  
6     Oklahoma, et al. versus Tyson Foods, Incorporated, et al.  
7     in the United States District Court for the Northern  
8     District of Oklahoma.

9                     My name is Wayne Neil. I'm the videographer.  
10    Our court reporter is Lisa Smith.

11                    Would the attorneys please introduce  
12    themselves for the record.

13                    MR. WALKER: Todd Walker with Faegre and  
14    Benson representing the Cargill defendants. With me is  
15    Chris Dolan of Faegre and Benson and Theresa Hill of the  
16    Rhodes Hieronymus firm.

17                    MR. MIRKES: Craig Mirkes for Peterson Farms.

18                    MR. CHADICK: Buddy Chadick for George's  
19    Incorporated.

20                    MS. WEAVER: Sharon Weaver and Pat Green for  
21    The State of Oklahoma.

22                             STEVE STEELE,  
23    having been first duly sworn, testified as follows:

24                    MS. WEAVER: Are we reserving objections  
25    except as to form or just following the Court rules,

1           A. Let me back up. When I told you I did some  
2 background investigations, the executive summaries myself  
3 and Mike Huff both did those and we would tape record those  
4 and send them into Lithochimiea. They'd send them to  
5 Ms. Bradshaw and they'd get the finished product.

6           Q. Those were background summaries -- background  
7 investigations you were doing of the defendant's experts?

8           A. Yes.

9           Q. Did you do background investigations of anybody  
10 other than defendant's experts?

11          A. Some employees at -- at the higher level and we  
12 didn't really -- I won't say we investigated, we did  
13 computer searches. Lexus Nexus, Usus, things of this  
14 nature.

15          Q. List for me as best you can the name of every  
16 person that you did a background investigation on.

17          A. ^ Names in the type -- in the investigation type  
18 that I described, I did one on Archie Schaeffer. I think  
19 we -- which kind of overlapped into Don and John Tyson. We  
20 did Lexus Nexus searches on Todd Simmons and his father, I  
21 can't remember his name. Those are the only names I can  
22 recall but there were more.

23          Q. Do you recall doing a background investigation of  
24 anybody with Cargill?

25          A. No, sir.